



August 16, 2024

Re: *In re: Uber Technologies, Inc. Passenger Sexual Assault Litigation*, 23-md-03084-CRB

Counsel,

Plaintiffs propose modifying the Third Party Subpoena directed to Chertoff Group narrowing the Requests for Documents therein as follows:

**Requests for Documents**

1. Please produce all communications with Uber and/or Uber's agents, employees, officers, or directors.
2. Please produce all documents exchanged with Uber and/or Uber's agents, employees, officers, or directors.
3. Please produce all communications with any current or former member of Uber's U.S. Safety Advisory Board.
4. Please produce all documents exchanged with any current or former member of Uber's U.S. Safety Advisory Board.
5. Please produce all documents reflecting payments or contributions made by Uber to The Chertoff Group including, but not limited to, any invoices, letters, cancelled checks, or accounting ledgers relating to Uber's U.S. Safety Advisory Board; Uber's First, Second, or Third U.S. Safety Report; or Uber's Sexual Misconduct or Violence Taxonomy.
6. Please produce all documents the Chertoff Group reviewed in preparation of "An Evaluation of Safety Incident Categorization Capabilities for Uber," included as, including all drafts, of Appendix III to Uber's First U.S. Safety Report covering the years 2017 and 2018.
7. Please produce all documents, including all drafts, of Uber's Second U.S. Safety Report covering the years 2019 and 2020.
8. Please produce all documents the Chertoff Group reviewed in preparation of any Appendices to, including all drafts, of Uber's Third U.S. Safety Report covering the years 2021 and 2022 or any drafts thereof.
9. Please produce all communications with Uber and/or Uber's agents, employees, officers, or directors relating to Uber's First, Second, or Third U.S. Safety Report.
10. Please produce all training materials provided by the Chertoff Group to Uber on issues relating to sexual assault, sexual misconduct, or the Sexual Misconduct and Violence Taxonomy.
11. Please produce all documents reflecting Uber's classification of reports of alleged sexual assault or sexual misconduct.
12. Please produce all documents reflecting Uber's the Chertoff Group's analysis of reports of alleged sexual assault or sexual misconduct.
13. Please produce all documents relating to work The Chertoff Group has performed on Uber's behalf or at Uber's request relating to sexual assault, sexual misconduct, the Sexual Misconduct and Violence Taxonomy, passenger safety, driver education, training for Uber employees, or how Uber responds to reports of sexual assault or sexual misconduct.



14. Please produce all documents reflecting the scope of work The Chertoff Group was retained to do for Uber, including contracts, agreements, and statements of work.
15. Please produce all documents related to recommendations from The Chertoff GROUP to Uber regarding how Uber rides can be made safer relating to sexual harassment, sexual assault, or sexual misconduct.

Sincerely,

Sam Hoefs  
Marlene Goldenberg

*Counsel for Plaintiffs*

Encl: Order Re: Third Party Subpoena Disputes